

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
) Case No. 13-36397-gmh
ERIC & ROSA NEAL,) Chapter 13
)
Debtor.)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Please take notice that the debtors, Eric & Rosa Neal, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby objects to the Motion to Dismiss as brought by Mary B. Grossman, Chapter 13 Trustee.

The debtor asserts that they have provided the Chapter 13 Trustee with copies of their 2014 taxes, and that they did not receive any tax refunds. The debtors assert that they will resume payments beginning in December. The debtors will also file an amended plan to address feasibility.

The debtor respectfully requests that the Court schedule a hearing on the matter.

Dated: December 8, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtor

/s/

By: Nathan E. DeLadurantey
State Bar No. 1063937

Drafted by:
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) Chapter 13
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Debtor.)

CERTIFICATE OF SERVICE

Matthew Hoenig states under oath that he is over the age of 18 and a attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 8, 2015, he delivered true and correct copies of the attached "Objection to Trustee's Motion to Dismiss" and "Certificate of Service" via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2015.

Signed: /s/ Matthew Hoenig
Matthew Hoenig

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